

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TAMMY BRAKE.

Plaintiff(s),

-against-

SLOCHOWSKY AND SLOCHOWSKY, LLP, EAST  
22ND STREET TOWERS LLC, YOSSEL  
LICHTMAN, SARA LICHTMAN, and MAYER  
WALDMAN,

Defendant(s).

**DEFENDANTS EAST 22ND STREET TOWERS LLC, YOSSEL LICHTMAN, SARA LICHTMAN, and MAYER WALDMAN'S DISCLOSURES PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendants East 22nd Street Towers LLC, Yossel Lichtman, Sara Lichtman, and Mayer Waldman ("Responding Defendants"), through their counsel, Gutman Weiss, P.C., make the following initial disclosures. These disclosures are based on information presently known and reasonably available to Responding Defendants and which Responding Defendants reasonably believe may use in support of their claims and defenses. Continuing investigation and discovery may cause Responding Defendants to amend these initial disclosures, including by identifying other potential witnesses, documents and by disclosing other pertinent information. Responding Defendants therefore reserve the right to supplement these initial disclosures.

By providing these initial disclosures, Responding Defendants do not represent that they are identifying every document, tangible thing or witness possibly relevant to this action. In addition, these disclosures are made without Responding Defendants in any way waiving their right to object to any discovery request or proceeding involving or relating to the subject matter of

these disclosures on any grounds, including competency, privilege, relevancy and materiality, hearsay, undue burden, confidentiality, or any other appropriate grounds. Furthermore, these disclosures are not an admission by Responding Defendants regarding any matter. Each and every disclosure set forth below is subject to the above qualifications and limitations.

**1. Individuals Likely to Have Discoverable Information**

The following individuals are likely to have discoverable factual information that Responding Defendants may use to support their claims or defenses in this action:

**TAMMY BRAKE**

Knowledge concerning her rental payment history, defaults in paying rent, merits of the initial Housing Court Action and subsequent Housing Court action, and her alleged damages.

**EAST 22ND STREET TOWERS LLC**

**311 Rogers Ave.**

**Brooklyn, NY 11225**

Knowledge concerning Plaintiff's rental payment history, defaults in paying rent, and merits of the initial Housing Court Action and subsequent Housing Court action.

**YOSSEL LICHTMAN**

**C/O EAST 22ND STREET TOWERS LLC**

**311 Rogers Ave.**

**Brooklyn, NY 11225**

Knowledge concerning Plaintiff's rental payment history, defaults in paying rent, and merits of the initial Housing Court Action and subsequent Housing Court action.

**THE EDGE REALTY GROUP LLC**

**C/O EAST 22ND STREET TOWERS LLC**

**311 Rogers Ave.**

**Brooklyn, NY 11225**

Knowledge concerning Plaintiff's rental payment history, defaults in paying rent, and merits of the initial Housing Court Action and subsequent Housing Court action.

**CHANIE WALDMAN**

**C/O EAST 22ND STREET TOWERS LLC**

**311 Rogers Ave.**

**Brooklyn, NY 11225**

Knowledge concerning Plaintiff's rental payment history, defaults in paying rent, and merits of the initial Housing Court Action and subsequent Housing Court action.

**SLOCHOWSKY & SLOCHOWSKY, LLP**

26 Court St. #304

Brooklyn, NY 11242

(718) 625-0987

Knowledge concerning the initial Housing Court Action and subsequent Housing Court action.

**2. Description of Documents**

The following enumerates documents, data compilations, and other tangible things in the possession, control or custody of Plaintiff that Plaintiff may use to support its claims or defenses in this action:

Records maintained by Defendant EAST 22ND STREET TOWERS LLC concerning Plaintiff's rental payment history and defaults in paying rent.

**3. Computation of Damages**

Responding Defendants have no claims for damages.

**4. Insurance**

Responding Defendants are unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in this action.

Dated: Brooklyn, New York

May 24, 2021

GUTMAN WEISS, P.C.

*Attorneys for the Responding Defendants*



By: Dov Medinets, Esq.  
2276 Sixty-Fifth Street, 2<sup>nd</sup> Floor  
Brooklyn, N.Y. 11204  
718-259-2100